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REPORT OF RCRA COMPLIANCE INSPECTION

GENERAL MOTORS CORPORATION - GM ASSEMBLY DIVISION - LEEDS PLANT
KANSAS CITY, MISSOURI

EPA ID NUMBER: MOD000822668

BY

THE U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION VII
SURVEILLANCE AND ANALYSIS DIVISION

INTRODUCTION

This inspection was conducted under authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, to evaluate the facility's compliance with the hazardous waste management regulations established pursuant to RCRA. This inspection was performed on November 17, 1981 at the request of the Enforcement Division, and was conducted in conjunction with a Preliminary Uncontrolled Hazardous Waste Site Investigation. The findings of the Uncontrolled Site Investigation are presented in a separate report.

PARTICIPANTS

U.S. Environmental Protection Agency:
Paul E. Doherty, Environmental Engineer

Ecology and Environment, Inc.:
James J. Buchanan, Chemist/Aquatic Biologist

General Motors Corporation:
Larry Pemberton, Plant Engineer
Roger Smith, Industrial Hygienist

FACILITY DESCRIPTION

The subject facility is an automobile assembly plant, SIC Code 3711. Production operations involve the complete assembly of automobiles from finished component

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RCRA RECORDS CENTER

parts and surface coating of the assembled auto bodies. No manufacturing of engines or drivetrain components takes place at this plant.

Receipt of components and raw materials at the facility is by rail and truck. Automobile shipments from the facility are also by rail and truck.

The plant currently produces the Pontiac "J" car, model J2000. A production output of 60 autos per hour is achieved at maximum production rates. Since the "J" car represents a new line for this facility, present production is somewhat below this level. The facility is operating two shifts per day and employs approximately 5,000 people.

The hazardous wastes handled at this facility, as declared on the Notice of Hazardous Waste Activity and Part A Permit Application, include the following:

D002 Corrosives (caustic soda)
D008 Lead Contaminated Waste (solder grindings)
F003 Spent non-halogenated solvents (Acetone)
F006 Electroplating sludges (chromic acid sludge)
F008 Electroplating bath solutions
F017 Paint residues
U002 Acetone (see F003)
U123 Formic Acid
U159 Methyl Ethyl Ketone (see F005)
U220 Toluene (see F005)

At the time of the inspection, an initial (Phase 1) Part A Permit Application review had been completed by EPA's ARHM/HAZM office. In response to EPA's (ARHM/HAZM) comment letter (11-9-81), GM officials stated that a revised Part A Permit Application will be submitted to EPA in the near future.

Anticipated changes in the Part A application are discussed in this report.

The following sections summarize the facility's hazardous waste operations;

and final treatment/disposal methods.

Corrosives (D002) - The facility has two uncovered rectangular tanks containing caustic soda used in miscellaneous paint stripping operations. The tanks are located in a separate building in the shipping area west of the main assembly plant (see attached map). Spent caustic soda has not been shipped off-site since enactment of RCRA regulations. The capacity of the tanks is reported as 13,247 pounds. At the present time, plant officials have no specific plans on how or where the caustic waste will be disposed of. This situation will be resolved when it becomes necessary to ship excess caustic waste off site for disposal.

Lead (D008) - The facility's lead waste was described as a "sour grind residue," generated during the grinding of soldered body joints. In the past, these grindings were stored in containers and returned to a metal company (Price Metal Company, Kansas City, Missouri) for recycling. The annual amount generated was reported as 189 tons. At the present time, the joint soldering procedure has been replaced by a welding process. Sour grind residue is no longer generated at the facility and this waste will be delisted on their revised Part A Permit Application.

Spent Non-Halogenated Solvents (F003 and F005) - The facility uses three (3) types of solvents: acetone, toluene and methyl ethyl ketone. The solvents are used principally for washing and cleanup of painting operations. The total annual quantity of spent solvent generated is reported as 157,500 pounds. The spent solvents are stored in drums and shipped by tank truck to a solvent recovery company - formerly Waste Research Reclamation of Eclaire, Wisconsin, presently

Solvent Recovery Corporation, Kansas City, Missouri. The majority of spent solvent is acetone and toluene. Only a small amount (if any) of methyl ethyl ketone is generated at the facility. This waste may be delisted from the revised Part A Permit Application if plant officials determine that it is not used anymore.

Electroplating Sludges (F006) - Prior to painting, the bare shell (sheet metal) of auto bodies undergoes a series of cleaning, preparation and undercoating treatment steps. The washed and cleaned bodies pass through a zinc phosphate coating proces (bonderite treatment), and then through a chromic acid bath. Both processes generate a sludge byproduct. The bonderite filtration process produces a sludge which is dewatered and stored in gondolas. The spent chromic acid solution undergoes treatment to reduce hexavalent chrome to trivalent chrome. Sludge from this process is dewatered and also stored in gondolas. The effluent from the chromic acid treatment is recirculated. It is reported that a total of 1.39 tons of electroplating sludge is generated annually. The sludge is ultimately shipped, in gondolas, to Kansas Industial Environmental Services, Inc. (KIES), Wichita, Kansas for disposal.

Plating Bath Sludges (F008) - Plating bath sludges from electroplating operations are generated at the facility. It is reported that a total of 64.6 tons of bath sludge is generated annually. However, since the electroplating operations at the Leeds' plant do not involve cyanides, these sludges would not be subject to regulation under the F008 listing. This waste will be delisted from the revised Part A Permit Application.

Paint Residues (F017) - Since the original submittal of the Part A Permit Application, the F017 hazardous waste listing has been formally suspended from the list of Hazardous Waste from Nonspecific Sources. Unless tests determine that

this waste exhibits hazardous waste characteristics, the waste would not be subject to hazardous waste permit regulation. Test results, reviewed during the inspection, showed that the paint residue waste did not exhibit hazardous waste characteristics. The tests were conducted by Aztec Testing Laboratories, Kansas City, Missouri.

Acetone (U002) - See F003.

Formic Acid (U123) - Although formic acid was listed on the facility's Notification of Hazardous Waste Activity, it was not included on the facility's Part A Permit Application. The facility uses a formic acid wash following the application of base paint to auto bodies. Spent formic acid solution is discharged into tanks, neutralized and discharged into the sanitary sewer (to POTW). The formic acid wash/neutralization process appears to qualify for a RCRA permit exemption under the provisions of 40 CFR 265.1 (c) (10).

Methyl Ethyl Ketone (U159) - See F005.

Toluene (U220) - See F005.

INSPECTION NARRATIVE AND FINDINGS

On Tuesday, November 17, 1981 at approximately 10:40 a.m., Mr. Jim Buchanan, of Ecology and Environment, and Mr. Paul Doherty, EPA/ENSV, arrived at the General Motors Corporation - GM Assembly Division - Leeds Plant office to conduct an unannounced RCRA inspection of the facility. In addition to the RCRA inspection, a preliminary Uncontrolled Site Investigation was to be conducted by obtaining all available information on past solid waste disposal practices both on site and in the immediate area. After showing their credentials at the reception desk,

the inspectors were subsequently introduced to Mr. Larry Pemberton, Plant Engineer and Mr. Rober Smith, Industrial Hygienist. The above individuals proceeded to the engineering offices at approximately 11:30 a.m. to discuss the purpose of the inspection, and the information to be reviewed. Also at this time, an itinerary for the day's activity was agreed upon.

GM officials were informed of EPA's Freedom of Information Requirements and the procedure for filing a Confidentiality Claim. GM officials declined to request confidentiality for any information provided during the inspection, but did ask that any request for documentation, reviewed during the inspection, should be submitted to GM in writing by the Regional Office. GM officials also requested duplicates of any pictures (Polaroid SX-70) taken during the inspection. The inspectors agreed to these requests.

The facility's past solid waste disposal practices were then discussed. These findings are presented in a separate Uncontrolled Site Preliminary Investigation Report. After discussing uncontrolled site activities, the RCRA inspection proceeded.

The GM-Leeds facility is both a generator and storer of hazardous waste material. The appropriate RCRA Compliance Checklist forms were completed during the inspection and are attached.

While at the engineering offices, all available written records and documents required under RCRA were reviewed. The facility uses State of Missouri Hazardous Waste Manifest Documents for the shipment of hazardous waste off site. The MDNR manifest does not provide space on the form for:

1. The Generator's EPA ID No.
2. The Transporter's EPA ID No.
3. The TSD Facility's EPA ID No.
4. An Alternative TSD Facility with EPA ID No. (optional)
5. Instructions for Undeliverable Shipments (optional).

The information for Items 1, 2 and 3, noted above, was otherwise not provided on the facility manifests reviewed, as required by 40 CFR 262.21 (a)(2), (3) and (4).

The facility's written operating record, as required by 40 CFR 265.73, appeared to be deficient. GM officials were able to provide required portions of the operating record (i.e. waste analyses, inspection reports, monitoring data, etc.), but could not produce a complete operating record which included an accurate inventory of "where, what and how" hazardous wastes are generated and stored at the facility. Company officials believed that such an inventory existed, but could not provide it at the time of the inspection.

The facility's hazardous waste inventory was again requested by telephone from Mr. Pemberton on Friday, November 20, 1981. At this time Mr. Pemberton agreed to provide a copy of the complete operating record, but to date, it has not been received by this office.

Company officials were not aware of whether the facility had made arrangements to familiarize local hospitals with the properties of hazardous wastes handled at the facility, as recommended by 40 CFR 265.37 (a). However, the company noted that there is usually a medical doctor with a nursing staff on-call at the facility. The doctor would, presumably, serve as a medical liaison to area hospitals should treatment of hazardous waste or similar injuries be

required. All remaining written records and documents required by RCRA were reviewed and found to be in order.

After reviewing the above records at the engineering offices, a visual inspection of all hazardous waste process and storage operations was conducted. No violations of RCRA requirements were noted during the inspection of the solvent cleaning operations, electroplating sludge treatment operation and caustic storage tank area.

At the time of the inspection a quantity of drums (approximately 153) were sitting by an empty trailer, some distance away from the drum storage canopy. These drums had been scheduled for shipment to a TSD facility, but the arrangements had recently been cancelled. As a result, the loading had not been completed. Inspection of these drums showed that not all drums were properly labeled as required by 40 CFR 262.30-32. Company officials stated that labeling was not completed because the scheduled shipment to the TSD facility had been cancelled. Also, in a subsequent telephone conversation, Mr. Pemberton stated that company workers had experienced difficulties with getting the proper labels to stick to the drums, so had temporarily reverted to a drum stenciling system, which identified the type of waste contained in the drums. Since this information was relayed by phone, it was not possible to personally verify the accuracy or acceptability of this identification system.

Since these drums were no longer being prepared for shipment off site, it is unclear whether the unlabeled drums constituted a violation of RCRA pretransport requirements. However, it should be is noted again that the

inspectors were unable to review the facility's waste inventory records at the time of inspection. In the absence of a comprehensive waste inventory system, proper labeling of individual drums, even prior to pretransport preparation, appears advisable, if not mandatory.

GM officials reported that the cancelled shipment of drums had been sitting in the present location for approximately seven to ten days. These drums contained ignitable waste solvents and were sitting approximately three to 15 feet from the facility's property line in apparent violation of 40 CFR 265.176. It appeared, however, that this was only a temporary situation which would be rectified when either the drums were shipped or returned to the canopy storage area.

The drum storage area, under canopy, contained three types of drums: drum shipments received from manufacturers, empty drums to be returned to manufacturers, and drums containing hazardous and non-hazardous waste material scheduled for disposal. In general, the drum storage area appeared to be in good shape. A few drums containing waste material were rusting, but the corrosion did not appear severe and the structural integrity of the drums did not appear compromised. Many of the waste containing drums were not labeled. Several bung-type drums were not sealed properly. It was not possible to determine by labeling whether the drums contained hazardous (waste solvent) or non-hazardous material (off-spec product). It is possible that company employees are able to identify the contents of these drums by stencil codes, but, again, inventory records were not available for review to confirm this.

SUMMARY

The following violations, or potential violations or RCRA regulations were noted during this inspection:

1. The facility's hazardous waste manifest forms did not include:

   a. The Generator's EPA ID No.

   b. The Transporter's EPA ID No.

   c. The TSD Facility's EPA ID No.

2. The facility's complete operating record was not available for review, and may not include a complete and current inventory of hazardous wastes on site as required by 40 CFR 265.73.

3. Drums being prepared for shipments were not properly labeled, as required by 40 CFR 262.31 and 262.32. It is noted that pretransport preparation had not been completed when shipment plans were cancelled.

4. Ignitable wastes (waste solvents) were located within 15 meters of the facility's property line in violation of 40 CFR 265.176. It is noted that the location was likely temporary pending resolution of final shipment plans.

5. Stockpiled drums containing hazardous and non-hazardous material were not clearly labeled. As indicated in item No. 2, a written inventory of stockpiled drums was not available for review. If an accurate inventory of stored hazardous waste drums is not routinely kept, then individual drums should be properly sealed and labeled in accordance with 40 CFR 262.3-262.32.

Attachments:

Site map
RCRA Compliance Inspection Report Checklist
Facility Photos (SX-70)

Paul E. Doherty
Environmental Engineer
ENSV/EP&R

2/1/82
Date

William J. Keffer
Chief
ENSV/EP&R

FEB 01 82
Date

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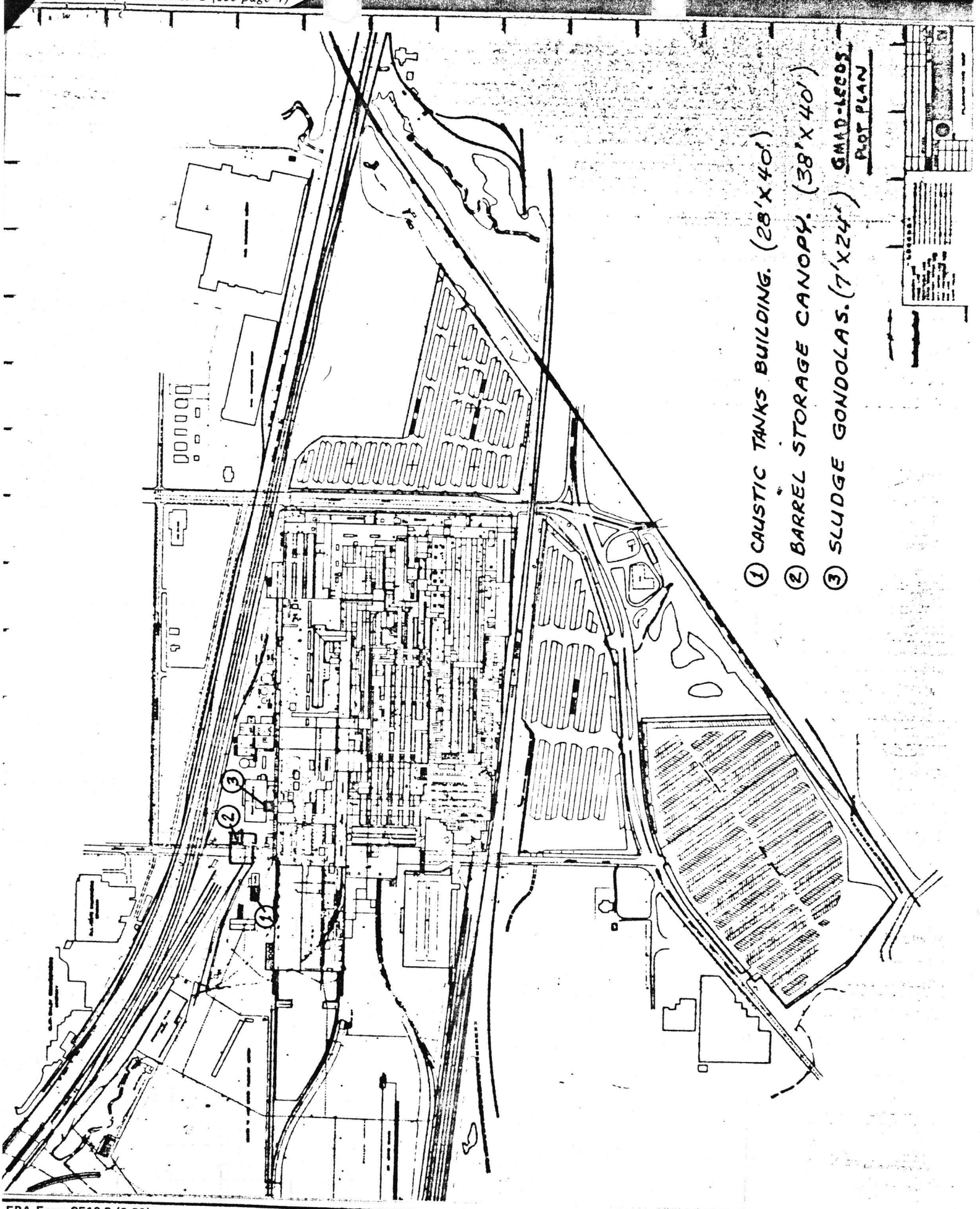
Form Approved OMB No. 158-S80004

. FACILITY DRAWING *(see page 4)*



MOD000622668
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS

I. General Information:

(A) Facility Name: GM ASSEMBLY PLANT - LEEDS

(B) Street: 6817 STADIUM DRIVE

(C) City: KANSAS CITY (D) State: MO (E) Zip Code: 64129

(F) Phone: 913-281-7388 (G) County: JACKSON

(H) Operator: SAME AS OWNER

(I) Street:

(J) City: (K) State: (L) Zip Code:

(M) Phone: (N) County:

(O) Owner: GENERAL MOTORS CORPORATION GM ASSEMBLY DIV

(P) Street: 6817 STADIUM DRIVE

(Q) City: KANSAS CITY (R) State: MO (S) Zip Code: 64129

(T) Phone: 913-281-7388 (U) County: JACKSON

(V) Type of Ownership: ____ Federal ____ Municipal X Private ____ State ____ County

(W) Date of Inspection: 11/17/81 (Q) Time of Inspection (From) 1130 (To) 1450

(X) Weather Conditions: FAIR - MID 60°S - SLIGHT WIND

(1) Person(s) Interviewed | Title | Telephone

LARRY PEMBERTON	PLANT ENGINEER	913-281-7388
ROGER SMITH	INDUSTRIAL HYGIENIST	913-281-7310

(2) Inspection Participants | Title | Telephone

LARRY PEMBERTON	PLANT ENGINEER	913-281-7388
ROGER SMITH	INDUSTRIAL HYGIENIST	913-281-7310
• JAMES BUCHANAN	GEOLOGY & ENV.	
PAUL DONERTY	EPA	

II. Description of Site Activity

(A) X Generator (Form 2)
(B) ____ Transporter (Form 3)
(C) ____ Chemical, Physical and Biological Treatment (Form 4)
(D) X Storage (Form 5)
(E) ____ Landfill (Form 6)
(F) ____ Incineration (Form 7)
(G) ____ Land Treatment (Form 4)
(H) ____ Thermal Treatment (Form 7)

(I) Comments: _____

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

	Yes	No	Not Inspected	See Remark Number
(J) Has this facility Submitted a Part A Permit Application?	X			INITIAL HAZA REVIEW LETTE. AUG 9, 1981

CRA COMPLIANCE INSPECTION REPO
GENERATORS CHECKLIST

Section A - EPA Identification No.

1. Does Generator have EPA I.D. No.? ✓ Yes ___ No

   a. If yes, EPA I.D. No. MDD000822648

262.21 Section B - Manifest

1. Does generator ship waste off-site? ✓ Yes ___ No

   a. If no, do not fill out Sections B and D.

   b. If yes, identify primary off-site facility(s) Use narrative explanations sheet.) STATE OF MI

2. Does generator use Manifest? ✓ Yes ___ No

261.5 a. If no, is generator a small quantity generator? NA Yes ___ No
   1. If yes, does generator indicate this when sending waste to a T/S/D facility NA Yes ___ No

   b. If yes, does manifest include the following information?

   1. Manifest Document No. ✓ Yes ___ No

   2. Generators Name, Mailing Address, Telephone No. ✓ Yes ___ No

262.21 (a)(2) 3. Generator EPA I.D. No. ___ Yes ✓ No NO SPACE ON FORM FOR EPA ID #

   4. Transporter(s) Name and EPA I.D. No. ___ Yes ✓ No

   5. a. Facility Name, Address and & EPA I.D. No. ___ Yes ✓ No
      b. Alternate Facility Name, Address and EPA ID NO. ___ Yes ✓ No
      c. Instructions to return to generator if undeliverable? ___ Yes ✓ No

   6. Waste information required by DOT - Shipping name, quantity, (weight, or vol.) containers (type and number.) ✓ Yes ___ No

   7. Emergency Information (optional) (special handling instructions, phone no.) ✓ Yes ___ No

(8) Is the following certification on each manifest form? ✓ Yes ___ No

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

(9) Does Generator retain copies of Manifests? ✓ Yes ___ No

If yes, complete a through e.

a. (1) Did generator sign and date all manifests? ✓ Yes ___ No
(2) Who signed for generator? Name ~~Jack~~ J. STILL Title SUPERINTENDENT SUPV.

b. (1) Did generator obtain handwritten signature and date of acceptance from initial transporter? ✓ Yes ___ No
(2) Who signed and dated for transporter? Name GREG HUNSON Title DRIVER

c. Does generator retain one copy of manifest signed by generator and transporter? ✓ Yes ___ No

d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? ✓ Yes ___ No

e. Does generator retain copies for 3 years? ✓ NA Yes ___ No
FIRST SHIPMENT 8-5-80

Section C - Hazardous Waste Determination

262.12 1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? ✓ Yes ___ No

a. If yes, list wastes and quantities (include EPA Hazardous Waste No.) SEE REPORT

2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosovity, ignitability, reactivity, EP toxicity) ✓ Yes ___ No

a. If yes, list wastes and quantities (include EPA Hazardous Waste No.) SEE REPORT

b. Does generator determine characteristics by testing or by applying knowledge of processes? TESTING

1. If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)? ✓ Yes ___ No

a. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there a[illegible]ther solid wastes generated by [illegible]nerators? ✓ Yes ___ No

   a. If yes, did generator test all wastes to determine non-hazardous characteristics? ✓ Yes ___ No
      ONLY THOSE SUSPECTED AS POTENTIALLY HAZARDOUS

      1. If no, list wastes and quantities deemed non-hazardous or processes from which non-hazardous waste was produced? (Use additional sheet if necessary.)

F008 - ELECTROPLATING BATH SOLUTION FOUND NON-TOXIC, ELIGIBLE FOR EXEMPTION SINCE CYANIDES ARE ABSENT

Section D - Pre-Transport Requirements

1. Does Generator package waste in accordance with 49 CFR 173 178, and 179? (DOT requirements) ✓ Yes ___ No

265.174 2. a. Are containers to be shipped leaking or corroding? ✓ Yes ___ No RUSTING SEE REPORT
   b. Use sheet to describe containers and condition.
   c. Is there evidence of heat generation from incompatible wastes in the containers? ___ Yes ✓ No

262.32 3. Does the generator use DOT labeling requirements in accordance with 49 CFR 172? ✓ Yes ___ No

4. Does the generator mark each package in accordance with 49 CFR 172? ___ Yes ✓ No ALL NOT MARKED

5. Is each container of 110 gallons or less marked with the following label? ___ Yes ✓ No SEE REPORT

   Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest policy or public safety authority or the U.S. Environmental Protection Agency.

   Generator's Name and Address GH [illegible]
   6817 STADIUM DRIVE
   KC MO 64129

   Manifest Document Number 01986009-078

262.33 6. Does generator have placards to offer to transporters? ___ Yes ✓ No PROVIDED BY SHIPPER

262.34 7. Accumulation Time

   a. Are containers used to temporarily store waste before transport? ✓ Yes ___ No

1. If yes, is each container clearly dated? Also, fill out rest of No. 7 (Accum. Time) ___Yes ✓No

b. 1. Does generator inspect containers for leakage or corrosion? (265.174 - inspections) ✓Yes ___No
2. If yes, with what frequency? DAILY

c. Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line? (265.176 - Special Requirements for Ignitable or Reactive wastes) ___Yes ✓No BARRELS DUE FOR SHIPMENT, STOCKPILED 3' FEET FROM FENCE

NOTE: If tanks used, fill out checklist for tanks.

d. Are the containers labeled and marked in accordance with Section D 3, 4, & 5 of this form? ___Yes ✓No NOT ALL STOCKPILED BARRELS LABELED

NOTE: If generator accumulates waste on-site, fill out checklist for General Facilities, Section B - Preparedness and Prevention, Section C - Contingency Plan and Emergency Procedures

e. Does generator comply with requirements for personnel training? (Attach checklist for 265.16 - Personnel Training) ✓Yes ___No

8. Describe storage area. Use photos and narrative explanation sheet.

262.40 Section E - Recordkeeping and Records

1. Does gnerator keep the following reports for 3 years?

a. Manifests and signed copies from designated facilities? ✓Yes ___No
b. Annual reports ✓Yes ___No
c. Exception Reports ✓Yes ___No
d. Test results ✓Yes ___No

2. Where are records kept (at facility or elsewhere)? MAINTENANCE OFFICE
3. Who is in charge of keeping the records? Name WALTER Title MOORE, SANITATION SUPV

Section F - Special Conditions

262.50 1. Has generator received from or transported to a foreign source any hazardous waste? ___Yes ✓No
a. If yes, has he filed a notice with the Regional Administrator? NA Yes ___No
b. Is this waste manifested and signed by Foreign consignee? NA Yes ___No
c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? NA Yes ___No

RCRA COMPLIANCE INSPECTION REP
FACILITIES CHECKLIST

Section A - General Facility Standards

262.12 1. Does facility have EPA Identification No.? ✓ Yes ___ No

A. If yes, EPA I.D. No. MOD000822668
If no, explain _____

262.50 2. Has facility received hazardous waste from a foreign source? ___ Yes ✓ No

A. If yes, has he filed a notice with the Reg. Admin. NA Yes ___ No

265.13 Waste Analysis

3. Does facility maintain a copy of the waste analysis plan at the facility? ✓ Yes ___ No

A. If yes, does it include

(1) Parameters for which each waste will be analyzed? ✓ Yes ___ No

(2) Test methods used to test for these parameters? ✓ Yes ___ No

(3) Sampling method used to obtain sample? ✓ Yes ___ No

(4) Frequency with which the initial analysis will be reviewed or repeated? ✓ Yes ___ No

(5) (for off-site facilities) Waste analyses that generators have agreed to supply? NA Yes ___ No

(6) (for off-site facilities) Procedures which are used to inspect and analyze each movement of hazardous waste including:

a. Procedures to be used to determine the identity of each movement of waste? NA Yes ___ No

b. Sampling method to be used to obtain representative sample of the waste to be identified? ✓ Yes ___ No

265.14 4. Does the facility provide adequate security through

A. 24-hour surveillance system? (e.g. television monitoring or guards) ✓ Yes ___ No

OR PLANT SECURITY PEOPLE

B. (1) Artificial or natural barrier around facility (e.g. fence or fence and cliff)? ✓ Yes ___ No
Describe FENCE
AND

(2) Means to control entry through entrances (e.g. attendant, television monitors, locked entrance, controlled roadway access)? ✓ Yes ___ No
Describe GUARDS AT GATE OR LOCKED

General Inspection Requirements

265.15 (b) 5. Does the owner/operator maintain a written schedule at the facility for inspecting:

a. Monitoring equipment? SECURITY PEOPLE HAVE ROUNDS ✓ Yes ___ No

b. Safety and emergency equipment? ✓ Yes ___ No

c. Security devices? ✓ Yes ___ No

d. Operating and structural equipment? ✓ Yes ___ No

e. Types of problems of equipment?

1. malfunction ✓ Yes ___ No

2. operator error ✓ Yes ___ No

3. discharges ✓ Yes ___ No

265.15 (d) 6. Does the owne[r] operator maintain an inspection [log]? ✓ Yes ___ No

A. If yes, does it include:

(1) Date and time of inspection? ✓ Yes ___ No

(2) Name of inspector? ✓ Yes ___ No

(3) Notation of observations? ✓ Yes ___ No

(4) Date and nature of repairs or remedial action? ✓ Yes ___ No

B. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet). ___ Yes ✓ No

265.16 Personnel Training

7. Does the owner/operator maintain Personnel Training Records at the facility? ✓ Yes ___ No
How long are they kept? TRAINING GIVEN TO NEW EMPLOYEES AS REQUIRED

A. If yes, do they include:

(1) Job title and written job description of each position? ✓ Yes ___ No

(2) Description of type and amount of training? ✓ Yes ___ No

(3) Records of training given to facility personnel? ✓ Yes ___ No

265.17 Requirements for Ignitable, Reactive or Incompatible Waste

(a) 8. Does facility handle ignitable or reactive wastes? ✓ Yes ___ No

A. If yes, is waste separated and confined from sources of ignit[i]on or reaction, (open flames, smoking, cutting and welc[d]ing, hot surfaces, frictional heat) sparks (static, electrical or mechanical), spontaneous ignition (e.g. from heat producing chemical reactions) and radiant heat? ✓ Yes ___ No

1. If yes, use narrative explanations sheet to describe separation and confinement procedures.
2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

B. Are smoking and open flame confined to specifically designated locations? ✓ Yes ___ No

C. Are "No Smoking" signs posted in hazardous areas? ✓ Yes ___ No

(b) 9. Check containers

A. Are containers leaking or corroding? ✓ Yes (RUSTING NOT SERIOUS) ___ No

B. Is there evidence of heat generation from incompatible wastes? ___ Yes ✓ No
(Use narrative explanations sheet to describe condition of containers.)

265.31 Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion or contamination of the environment? ___ Yes ✓ No

If yes, use narrative explanations sheet to explain.

265.32 2. Is the facility equipped with

A. Internal communication or alarm system? ✓ Yes ___ No

(1) Is it easily accessible in case of emergency? ✓ Yes ___ No

B. Telephone or two-way radio to call emergency response personnel? ✓ Yes ___ No

C. Portable fire extinguishers, fire control equipment spill control equipment and decontamination equipment? ✓ Yes ___ No

265.33 (1) Is this equipment tested to assure its proper operation? ✓ Yes ___ No

D. Water of adequate volume for hoses, sprinklers or water spray system? ✓ Yes ___ No

(1) Describe source of water CITY WATER W/ UNDERGROUND STORAGE SYSTEM

265.35 3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? ✓ Yes ___ No

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265.37 4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) PLANT SECURITY HAS ANNUAL MEETING WITH FIRE DEPT ✓ Yes ___ No

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265.50 5. In the case that more than one police and fire department might respond, is there a designated primary authority? ✓ Yes ___ No
a. If yes, list primary authority _____

265.52 (a) 6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors and equipment suppliers? ✓ Yes ___ No
Are they readily available to all personnel? ✓ Yes ___ No

(c) 7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? DOCTOR AT FACILITY WITH NURSING STAFF ___ Yes ✓ No

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8. If State or local authorities decline to enter, is this entered in the operating record? NA ___ Yes ___ No

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265.52 Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility? ✓ Yes ___ No

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a. If yes, is it a revised SPCC Plan? ✓ Yes ___ No

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2. Is there an emergency coordinator on site at all times? ✓ Yes ___ No

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Section D - Manifest System, Recordkeeping and Reporting

265.71 1. Does facility receive waste from off-site? ___ Yes ✓ No

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a. If yes, does the owner/operator retain copies of all manifests? NA Yes ___ No

(1) Are the manifests signed and dated and returned to the generator? NA Yes ___ No

(2) Is a signed copy given to the transporter? NA Yes ___ No

2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? ___ Yes ✓ No

a. If yes, is it accompanied by a shipping paper? NA Yes ___ No

(1) Does the owner/operator sign and date the shipping paper and return a copy to the generator? NA Yes ___ No

(2) Is a signed copy given to the transporter? NA Yes ___ No

3. Has the owner/operator received any shipments of waste which were inconsistent with the manifest? (manifest discrepancies) 265.72 NA Yes ___ No

a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? NA Yes ___ No
1. If no, has Regional Administrator been notified? ___ Yes ___ No

4. Does the owner/operator keep a written operating record at the facility? 265.73 NOT AVAILABLE FOR REVIEW ___ Yes ___ No

A. If yes, does it include:

(1) Description and quantity of each hazardous waste received? NONE RECEIVED NA Yes ___ No

(2) Location and quantity of each hazardous waste at each location? ___ Yes ✓ No NOT LOGGED REGULARLY

(3) Records and results of waste analyses? ✓ Yes ___ No

(4) Reports of incidents involving implementing of the contingency plan? NOT REQUIRED TO DATE ___ No

(5) Records and results of required inspections? ✓ Yes ___ No

(6) Monitoring, testing or analytical data? ✓ Yes ___ No

(7) Closure cost estimates and for disposal facilities post-closure cost estimates? (Not effective until May 19, 1981.) NA ___ Yes ___ No

265.76 b. Has the facility received any waste (that does not come under the small generater exclusion) not accompanied by a manifest? NA ___ Yes ___ No

a. If yes, has he submitted an unmanifested waste report to the Regional Administrator? NA ___ Yes ___ No

DATE_____

EPA ID NO._____

RCRA COMPLIANCE INSPECTION REPORT
NARRATIVE EXPLANATIONS

SECTION_____ PART_____

SECTION_____ PART_____

SECTION_____ PART_____

DATE_____

EPA ID NO._____

RCRA COMPLIANCE INSPECTION REPORT
NARRATIVE EXPLANATIONS

SECTION_____ PART_____

SECTION_____ PART_____

SECTION_____ PART_____

1. Are there any tanks ich are not being used which th acility no longer plans to ? ___yes ✓no

   a. If yes, has all hazardous waste and hazardous waste residue been removed from these tanks, discharge control equipment, and discharge confinement structures? NA yes ___no

265.192 2. Are tanks presently used to treat or store waste? ✓yes ___no

   a. If no, do not complete rest of form.
   b. If yes, check tanks.

   Is there evidence that incompatible wastes have been placed in the tank? Is there evidence of any ruptures, leaks or corrosion? (Use narrative explanations sheet) ___yes ✓no

3. Are there any uncovered tanks? ✓yes ___no

   a. If no, do not complete B-E
   b. If yes, do they have 2 feet (60cm) freeboard? ✓yes ___no

   or

   c. A containment structure? (e.g. dike or trench) NA yes ___no

   or

   d. A drainage control system? NA yes ___no

   or

   e. A diversion structure? (e.g. standby tank) NA yes ___no
   (NOTE: The structure in c,d or e must have a capacity that equals or exceeds the volume of the top 2 feet (60cm) of the tank.

4. Are any of the tanks continuous feed? ✓yes ___no

   a. If yes, is it equipped with a means to stop inflow (e.g. waste feed cutoff or by-pass to a stand-by tank)? ✓yes ___no

.193 Waste Analysis

5. Is the tank used to store one waste exclusively? ✓ yes ___ no

   a. If no, what are the different wastes stored in the tank? (Use narrative explanations sheet)

   b. Are waste analyses and trial treatment or storage tests done on these different wastes? NA yes ___ no

      (1) If no, does he have written, documented information on similar storage or treatment of similar wastes? NA yes ___ no

   c. Are there records available of these waste analyses in the operating record? NA yes ___ no

265.194 Inspections:

6. Does the owner/operator inspect the following at least daily? ✓ yes ___ no

   a. Discharge control equipment (e.g. waste feed cut-off, by pass and/or drainage systems)? ✓ yes ___ no

   b. Monitoring equipment (e.g. pressure and temperature gages)? ✓ yes ___ no

   c. Level of waste in each uncovered tank? ✓ yes ___ no

7. Does the owner/operator inspect the following at least weekly? ✓ yes ___ no

   a. Construction materials of tanks for corrosion or leaks? ✓ yes ___ no
   b. Construction materials of and area surrounding discharge confinement structures for erosion or signs of leakage? ✓ yes ___ no

8. Is a written schedule of these inspections kept at the facility? ✓ yes ___ no

9. Does the facility maintain a record of the closure plan on site? ✓ yes ___ no

10. Are ignitable or reactive wastes placed in tanks? ✓ yes ___ no

    a. If yes, are they treated, rendered or mixed before or immediately after placement in the tank so it no longer meets the definition of ignitable or reactive? ✓ yes ___ no

       Or

    b. Is the waste protected from sources of ignition or reaction? ✓ yes ___ no

3. (continued)

(1) If yes, use narrative explanations sheet to describe separation and confinement procedures

(2) If no, use narrative explanations sheet to describe sources of ignition or reaction

or

c. Is the tank used solely for emergencies? ___yes ✓no

11. Are incompatible wastes placed in the same tank? ___yes ✓no

12. If a waste is to be placed in a tank that previously held an incompatible waste, was that tank washed? NA yes___no

a. If yes, describe washing procedures (Use narrative explanations sheet)

Describe how it is possible for incompatible waste to be placed in the same tank. (Use narrative explanations sheet)

PHOTOS
RCRA COMPLIANCE INSPECTION
GENERAL MOTORS CORPORATION - GM ASSEMBLY DIVISION - K.C., MO

PHOTO NO. 1

Caustic soda storage tanks

PHOTO NO. 2

Drum storage canopy; outgoing (empty) drums on left; incoming drummshipments on right; waste storage drums behind empty drums (not shown)

PHOTOS
RCRA COMPLIANCE INSPECTION
GENERAL MOTORS CORPORATION - GM ASSEMBLY DIVISION - K.C., MO

PHOTO NO. 3

Hazardous waste drums awaiting shipment; properly labeled, located within 50 meters of property line

PHOTO NO. 4

Hazardous waste drums awaiting shipment; not properly labeled, located within 50 meters of property line

PHOTOS
RCRA COMPLIANCE INSPECTION
GENERAL MOTORS CORPORATION - GM ASSEMBLY DIVISION - K.C., MO.

PHOTO NO. 5

Hazardous waste drums awaiting shipment; not properly labeled, located within 50 meters of property line

PHOTOS
RCRA COMPLIANCE INSPECTION
GENERAL MOTORS CORPORATION - GM ASSEMBLY DIVISION
KANSAS CITY, MISSOURI

PHOTO NO. 1

Caustic soda storage tanks

Photographer: James J. Buchanan

Direction of View: West

Time: 2:15 p.m.

PHOTO NO. 2

Drum storage canopy; outgoing (empty) drums on left; incoming drum shipments on right; waste storage drums behind empty drums (not shown).

Photographer: James J. Buchanan

Direction of View: Northeast

Time: 2:30 p.m.

PHOTOS
RCRA COMPLIANCE INSPECTION
GENERAL MOTORS CORPORATION - GM ASSEMBLY DIVISION
KANSAS CITY, MISSOURI

PHOTO NO. 3

Hazardous waste drums awaiting shipment; properly labeled, located within 50 meters of property line.

Photographer: James J. Buchanan

Direction of View: Northeast

Time: 2:35 p.m.

PHOTO NO. 4

Hazardous waste drums awaiting shipment; not properly labeled, located within 50 meters of property line.

Photographer: James J. Buchanan

Direction of View: Southeast

Time: 2:40 p.m.

PHOTOS
RCRA COMPLIANCE INSPECTION
GENERAL MOTORS CORPORATION - GM ASSEMBLY DIVISION
KANSAS CITY, MISSOURI

PHOTO NO. 5

Hazardous waste drums awaiting shipment; not properly labeled, located within 50 meters of property line.

Photographer: James J. Buchanan

Direction of View: West

Time: 2:45 p.m.